

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

Jamaal Lloyd and Anastasia Jenkins,  
individually and on behalf of all others  
similarly situated, and on behalf of the W  
BBQ Holdings, Inc. Employee Stock  
Ownership Plan,

Plaintiffs,

v.

Argent Trust Company, Herbert Wetanson,  
Gregor Wetanson, and Stuart Wetanson,

Defendants.

*Granted. The parties shall identify  
any redactions they wish to  
be made to these documents  
when they are publicly*

Case No. 1:22-cv-04129-DLC

*filed by 6/6/25.*

*Wetanson  
6/4/25*

**MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Section 8.B of the Court's Individual Practices, Plaintiffs respectfully move this Court for an order granting leave to file the following materials under seal in connection with their Motion for Leave to File a Second Amended Complaint:

1. An unredacted Memorandum of Law in Support of Plaintiffs' Motion for Leave to File a Second Amended Complaint, which references materials designated as "Confidential" by Defendants;<sup>1</sup>
2. Unredacted versions of Exhibits 1 and 2 to the Motion, which are the clean and redlined copies of the proposed Second Amended Complaint, which references materials designated as "Confidential" by Defendants.
3. The following exhibits to the Declaration of Ryan Wheeler that contain materials

<sup>1</sup> Plaintiffs intend to publicly file a redacted version of the Memorandum that omits references to material designated as "Confidential" by Defendants.

designated as “Confidential” by Defendants under the Protective Order in this action (ECF 108): Exhibits 6-9.

In accordance with Your Honor’s Individual Practice Rules, the exhibits proposed to be filed under seal, as well as a highlighted copy of the Memorandum of Law and Second Amended Complaint are being filed under seal contemporaneously to this letter motion.

WHEREFORE, subject to Defendants making the necessary showing required by the Protective Order, Plaintiffs respectfully request that this Court enter an order allowing them to file the aforementioned materials under seal in connection with their Motion for Leave to File a Second Amended Complaint.

Dated: June 2, 2025

Respectfully submitted,

/s/ Michelle C. Yau  
Michelle C. Yau (*pro hac vice*)  
Daniel R. Sutter (*pro hac vice*)  
Ryan A. Wheeler (*pro hac vice*)  
Caroline E. Bressman (*pro hac vice*)  
Cohen Milstein Sellers & Toll PLLC  
1100 New York Ave. NW  
Suite 800  
Washington, DC 20005  
Tel: (202) 408-4600 Fax: (202) 408-4699  
myau@cohenmilstein.com  
dsutter@cohenmilstein.com  
rwheeler@cohenmilstein.com  
cbressman@cohenmilstein.com

Michael Eisenkraft (ME-6974)  
Cohen Milstein Sellers & Toll PLLC  
88 Pine Street  
14th Floor  
New York, New York 10005  
Tel: (212) 838-7797  
Fax: (212) 838-7745  
meisenkraft@cohenmilstein.com